

1 Q You've never talked to him either on the phone
2 or in person?

3 A No, only through the paperwork.

4 Q You testified this morning, I believe, about
5 your awareness concerning Trinity having 12 broadcast
6 television stations.

7 A Yes.

8 Q Do you know the form of ownership of those 12
9 stations? And if I'm unclear --

10 A Of who actually owns them?

11 Q Yes, sir.

12 A I don't really understand how it works, no.

13 Q Well, for example, if I were to tell you that
14 Trinity Broadcasting Network, or what is now Trinity
15 Christian Center of Santa Ana doing business as Trinity
16 Broadcasting Network, has the licenses for certain stations
17 and that a corporation named Trinity Broadcasting of Arizona
18 has the license for a station in Phoenix and a corporation
19 by the name of Trinity Broadcasting of Oklahoma City has a
20 license for a station in Oklahoma City, and Trinity
21 Broadcasting of Indiana has a license for a station in
22 Bloomington, Indiana and also one in Richmond, Indiana, is
23 this something that's new to you?

24 A Yes, the formality of it is. I just figured it
25 was Trinity Broadcasting, the corporation, and they owned

1 them all.

2 Q So the way you understood the situation was
3 that Trinity Broadcasting Network had 12 and then NMTV had
4 two?

5 A Yes.

6 Q When NMTV was the licensee for Odessa, do you
7 have any knowledge as to how many hours per day the Odessa
8 station was broadcasting?

9 A No.

10 Q With respect to Portland, do you have any
11 knowledge as to how many hours a day Portland was
12 broadcasting?

13 A I don't recall those figures, no.

14 Q If I were to tell you that Portland was
15 broadcasting 24 hours a day at certain points in time during
16 your tenure as a director, would that be news to you?

17 A No. I mean, I would think that's great.

18 Q I mean, is this something that you may have
19 been aware of but just is not in the forefront of your mind
20 right now?

21 A Yeah. In other words, I've never gotten far
22 enough in my mind and my thinking about the stations to
23 really follow up and wonder. I just assume it's like our
24 local TV network is, and that's a 24-hour-a-day network, so
25 I kind of base my thinking on just what I'm familiar with.

1 And even right now to this moment right now, I
2 mean, I just figure that they're on all the time or that --
3 like I've heard of some other TV networks that they have
4 programming for so many hours of the day maybe, but I'm
5 really not sure one way or the other.

6 Q Let me see if I can get at this another way.
7 You've mentioned the local station. I take it by that you
8 are talking about channel 40 in this area?

9 A Yes.

10 Q Your understanding of the programming for that
11 station is that it is on 24 hours a day?

12 A Right.

13 Q And it has been for at least the past five
14 years?

15 A Right.

16 Q Would it be your understanding that the NMTV
17 station in Portland had for any period of time also
18 broadcast 24 hours a day and was getting its programming,
19 either some or all of it, from channel 40 here?

20 A Yeah, I understood that.

21 Q With that in mind, do you recall how it came to
22 be that you assumed that? In other words, do you recall any
23 conversations now to that effect or --

24 A Basically what I picked up from talking about
25 TV and network, just formal and informal about TV, one of my

1 elders is an engineer at TBN, so of course talking to him,
2 how his TV networks work and all that type of stuff, I
3 assumed, without ever asking him the pointed question how
4 many hours Portland is on, I just assumed it was on many
5 hours.

6 And I assumed that well, if they've got a TV
7 network, they already have programs that are produced here,
8 so they of course put them on, and as soon as we get the
9 productions to them and stuff like that in Portland, then
10 they start producing their own local Praise show and they
11 have their own guests and stuff like that, but in the
12 meantime you utilize what you have.

13 Q Let me back up a second. Just so we have that
14 information in the record, who is the person you are
15 referring to?

16 A Tim Trader.

17 Q Is he Lois's husband?

18 A Yes.

19 Q So the assumption that you are working on as a
20 result of conversations with Tim, among other people,
21 perhaps, was that the station in Portland was in some way
22 picking up and broadcasting the programs that you could see
23 here on channel 40?

24 A Yeah, kind of -- because when I'm up north all
25 the time, you have these stations that are doing ABC, but

1 they call them affiliate stations, so that's what I figured
2 everybody did, everybody just transfers their tapes.

3 Q You understood their relationship --

4 MR. TOPEL: Excuse me. I don't mean to interrupt,
5 but I'm not sure the witness finished his answer.

6 THE WITNESS: Yeah, I'm okay.

7 BY MR. SHOOK:

8 Q You understood the relationship, then, between
9 the Portland station and the station in Santa Ana to be
10 essentially the same as that relationship between an ABC
11 affiliate and ABC in New York?

12 A Yes.

13 Q With the last question and answer in mind, was
14 that the basis for some of your thinking that if you did a
15 program, let's say, about gangs, and you mentioned two gang
16 names, the Bloods and the Crips, that if you were to do a
17 program about them, even though these gangs are located in
18 this area, I take it, that what information you could bring
19 to the public's attention would be something worthwhile for
20 people in Portland to see?

21 A Exactly.

22 Q And any other station that National Minority
23 might have?

24 A In other words, the more stations that could
25 pick it up, the better, because it would be generic for

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1 everybody to learn.

2 Q Was it ever discussed with you or did it ever
3 come to your attention who National Minority TV's audience
4 was? We already know that they had a station in Portland,
5 but was it ever brought to your attention who else was in a
6 position to receive National Minority TV programming?

7 A No, I don't think we got that far with it.

8 Q Did you have any idea in terms of the total
9 number of people that were being reached and the percentage
10 of those people that may be minorities?

11 A No. It was still kind of like in the
12 incubation period of being able to reach out to the
13 minorities.

14 Q Now, Mr. Cohen had asked you a number of
15 questions about the annual meeting of National Minority TV,
16 Inc. for 1992. And one of the things that was noted in the
17 minutes here is that -- and I will read this portion -- I'll
18 go back one paragraph:

19 "Station Manager, Jim McClellan,
20 stated that local programming will begin this
21 year in Portland when the production
22 facilities are completed. Mr. McClellan also
23 stated that training programs for minorities
24 are in place. At the present time six
25 minorities are on staff, including an

1 Oriental, a native American and four blacks.
2 An advisory committee is being formed to help
3 the station help the Portland minority
4 communities."

5 The final paragraph that I wish to read, "Local
6 programming will include minority programming."

7 Did it ever come to your attention that such
8 local programming was ever produced and aired?

9 A Yeah, we were talking about getting it done,
10 and I remember when I talked with Jim, we were talking about
11 him being able to produce shows that would be especially
12 geared towards minorities.

13 Q And do you recall whether any such actual
14 programming made it beyond the idea stage, that such
15 programming was actually produced and broadcast?

16 A I think Jim told me, first off, they had a
17 local Praise the Lord show that had to do with local people
18 coming in, and we did a lot of issue-oriented things, like
19 we had our mayor talk about gang things, community people;
20 in other words, they weren't necessarily Christians, just
21 community people coming in and making a lot of awareness,
22 housing programs, things I remember them bringing in.

23 Yeah, the awareness of the whole minority
24 situation has increased, increased and increased, and I
25 think it's been because of this.

1 Q You mentioned a particular program, that being
2 the Praise the Lord program, which, if I am correct in
3 understanding your answer, was something that ultimately was
4 produced in Portland, that there was a local Praise the Lord
5 program and that it included Portland people or Portland
6 area people who would come in and talk about problems of one
7 kind or another and solutions to those problems.

8 A Right.

9 Q Outside of the Praise the Lord program, can you
10 think of any other programs that would fall into the
11 category that's reflected in the minutes here, that is,
12 local programming that involves or includes minority
13 programming in some fashion?

14 A I think maybe not -- I think guestwise, yes.
15 But actual programs, like a certain program for it, I don't
16 know if there is any new thing like that, but definitely the
17 number of different guests that have to do with that
18 situation.

19 Q And these are guests that were appearing on the
20 local Praise the Lord program?

21 A Yes.

22 Q There was a time, according to the records,
23 when Set Free was receiving, I believe it was, \$5,000 a
24 month.

25 A \$5,000 a month.

1 Q Am I correct in that?

2 A Yes.

3 Q At the time that money was coming in, for the
4 period of time that it was coming in, would you say that
5 that was a significant percentage of the money that came
6 into Set Free or an insignificant percentage?

7 A Very insignificant.

8 Q You had suggested during one response to a
9 question from Mr. Cohen, I think, and if I'm wrong about
10 that, it was perhaps just an off-the-record comment, that
11 there was something that you wanted to say but that we
12 weren't asking the right questions.

13 Is there anything that you wanted to tell us
14 about the situation involving NMTV that you have not been
15 able to tell us because we just haven't asked you the right
16 question?

17 A No. I was making a reference to I feel like my
18 weak areas are pointed out because I'm not a paperwork
19 lawyer-type reading guy.

20 Q You're not a detailed man?

21 A Yeah, at all. But that doesn't mean I don't
22 care about details. My secretary is a detailed person. She
23 can tell you at any meeting the one fellow was sleeping for
24 real or just snoring with his eyes closed, or whatever. She
25 can do all that stuff, and that's why I have her work with

1 me. She is more like a secretary. She's a court reporter.
2 She's all those things. And that's kind of what I've left
3 certain things to in this.

4 And so I felt like my strong point, or what I
5 think is my strong point anyway, is I'm really concerned
6 about the minorities and concerned about them being spoken
7 to into their homes, into the workplace, and that type of
8 thing. So it was kind of just like a personal thing.

9 Q In other words, you and your secretary make a
10 great team because you cover both aspects, big picture and
11 the details?

12 A Yes. And so Jane Duff I see as that same
13 thing. So whenever I say Jane did it, and that kind of
14 stuff, what I'm referring to -- my secretary isn't just a
15 secretary. She is a full-blown administrative assistant,
16 chief of operations, you know, specialist.

17 And my treasurer, he takes care of all that
18 business. I don't get involved in that. But do I look at
19 the books -- I look to see if we owe or if we don't owe, you
20 know, that kind of thing. And if we don't owe and things
21 are growing and everything is happening, I just kind of --
22 it looks good to me.

23 Q With respect to owing and not owing, at one
24 point in time Mr. Cohen brought up to you that consideration
25 was given by the NMTV board to making a loan to an entity

1 called Community Brace.

2 A Yes.

3 Q Was it ever discussed why the loan should come
4 from NMTV as opposed to coming directly from Trinity?

5 A Well, because we were involved in -- not
6 wanting to blow a horn, but we wanted to make sure that we
7 were doing what I believe we were supposed to be doing,
8 helping minorities, and so it was just a double impact of
9 something that we could do, because we had different ideals.
10 It didn't all come to pass, but we had good intentions.

11 Q I recognize that it didn't come to pass. The
12 focus of my questions are --

13 A We wanted a minority thing, definitely.

14 Q Let me start again. The money was going to
15 come from National Minority TV and not from Trinity in terms
16 of a direct loan to Community Brace.

17 My question to you, and I believe you've
18 provided an answer, is: Why wasn't Trinity going to lend
19 the money directly as opposed to National Minority TV?

20 A E.V. and I were real strong about wanting to be
21 us, you know, National Minority.

22 Q At the same time, though, this is with the
23 understanding that National Minority TV, in order to make
24 this loan to Community Brace, was going to have to borrow
25 the money from Trinity. You were aware of that, right?

1 A I don't have the details of it. But, I mean, I
2 can assume that that's how it was going to happen.

3 Q Didn't you understand that that was part of the
4 big picture, that NMTV, in order to make the loan to
5 Community Brace, was in turn going to have to borrow the
6 money from Trinity?

7 A Yes.

8 Q You knew that or you understood that?

9 A I understood that, yes.

10 Q Now, with that in mind, the question that I
11 come back to is: Why is it prudent -- maybe I should put it
12 this way: Why is it prudent for National Minority to make
13 this kind of a loan when in order to do so it has to borrow
14 money?

15 A Because, and this is just my own personal
16 opinion, because we were trying to build our own foundation
17 for what we do, for what our concerns are, for what we want
18 to see happen, and eventually -- because I'm looking down
19 the line at some day we're going to have our own minority
20 network, whatever that means in Greek, I'm not sure how that
21 all works, but, I mean, I'm looking at it as me being the
22 president.

23 Q You saw this as furthering a corporate purpose?

24 A Yes.

25 MR. SHOOK: Pastor Phil, I believe I have covered the

1 areas I want to cover. I have no further questions for you.

2 MR. TOPEL: Let's take a short recess.

3 (Recess taken.)

4 MR. TOPEL: On the record.

5

6

EXAMINATION

7 BY MR. TOPEL:

8 Q Pastor Aguilar, do you recall whether or not
9 you participated in any discussions with other National
10 Minority board members by conference call?

11 A I think there was two or three by conference
12 call, yeah, two or three board meetings that were done where
13 we had, you know, a number of board members.

14 Q Just to see if your recollection can be
15 refreshed, I'd like to show you a letter dated September 13,
16 1991, document number 05300 to 05304. It's a letter from
17 Colby May to Paul Crouch and Jane Duff dated September 13,
18 1991.

19 In reviewing this document, I'd like to see if
20 this refreshes your recollection as to whether you
21 participated in a conference call concerning the subject
22 matter that's discussed in that letter. Look at the whole
23 letter.

24 A Okay. Just real quick, though, can I ask a
25 question?

1 MR. COHEN: Sure.

2 THE WITNESS: There is one of these, but it was
3 printed differently. I mean, I got one of these. Was it
4 the same type of print and everything like that?

5 BY MR. TOPEL:

6 Q I'm not even suggesting you got this letter.

7 A I'm just wondering, because I'm remembering one
8 that I got, but it was different print and everything like
9 that. Might be just the information. Just thought I'd
10 throw that in.

11 Q In particular, to expedite, focusing on point
12 number 1, particularly the paragraph that begins in the
13 middle of the page that begins with the words "at this
14 point," and then paragraphs 1, 2 and 3.

15 A Okay. Yeah, that's the phone call where I was
16 talking to Paul Crouch, Jane was on the phone, Joe was on
17 the phone, and we were talking about options that we were
18 going to do.

19 Q Now, do you recall whether in the course of
20 that telephone conversation you discussed any of the
21 information that appears in your affidavit that Mr. Cohen
22 showed you at the start of your examination, document number
23 51755 through 51766?

24 A These were details in preparing for this right
25 here. We were talking about the thing on the Register thing

1 here. Yeah, that's exactly what we were doing in this
2 conversation, just talking about how we were going to answer
3 the FCC.

4 Q Thank you. Can you tell me during the time
5 that you were a director of National Minority Television who
6 the people were who you understood had the right to vote on
7 issues concerning that company.

8 A Well, I didn't understand details on the
9 Commission or this and all that kind of stuff. I just knew
10 there were three people who voted, Paul Crouch, Jane Duff
11 and myself.

12 Q Were there ever any other people who had the
13 right to vote?

14 A Not until E.V. Hill came on.

15 Q I think I recall Mr. Cohen asked you some
16 questions about houses that Trinity Broadcasting Network had
17 licensed for Set Free.

18 Has Set Free received any such housing from any
19 other parties besides Trinity Broadcasting?

20 A Yes. Set Free has had numerous houses before
21 we ever had any relationship with TBN. We had another 14
22 houses. We've had numerous ones that are from the City of
23 Anaheim itself. We've had homes that we've gotten from the
24 mayor of our town.

25 So before we met Trinity, we've always had

1 quite a number of homes that we've had where we've done the
2 kind of work that we do, and Trinity came on the scene later
3 on.

4 Q Can you tell me some of the other entities that
5 have provided housing to Set Free.

6 A The City of Anaheim, per se, and different
7 homeowners in the town who believe in the work that we're
8 doing. Basically that's it.

9 Q For the record, can you tell me what you mean
10 by the work that you're doing, what you do at these houses.

11 A We've been commended for the work that we do
12 with housing the homeless, working with those with alcohol
13 or drug problems, incorrigibles, court-assigned people,
14 parolees, people with AIDS, and just about every other kind
15 of problem-type people we've worked with.

16 Q Do you understand the provision of these houses
17 to be in the form of charitable donations to your work?

18 A Yes.

19 Q Is that a correct statement?

20 A Exactly. The reason that TBN has let us use
21 those homes is because the work that we do.

22 Q To what extent, if any, does the provision of
23 homes by these various parties, in your mind, give these
24 parties the ability to control you individually, Set Free?

25 A They've never said anything about how we run

1 our homes or never would say anything about how we run our
2 homes, because we run our homes how we run our homes, and so
3 there is no -- you know, anybody who lets us use a home,
4 there are no strings attached.

5 Q Mr. Cohen, you will recall, asked you some
6 questions about attorneys for National Minority Television.
7 Does the name Tyrone Brown mean anything to you?

8 A Yes.

9 Q And what does it mean to you?

10 A Well, we were having our meetings, and I
11 personally thought Colby May was a good attorney but a young
12 attorney, and I thought we needed to call in someone who was
13 more familiar with minorities, who was a minority, with
14 putting together the thing for the FCC, and that's where
15 E.V. Hill also expressed that.

16 And we ended up with Tyrone, and I got to meet
17 him and spend some time with him. I took him home, and we
18 just kind of became friends talking about what we were
19 trying to accomplish with NMTV.

20 Q Now, you answered my next question, which was
21 going to be whether you met Tyrone Brown.

22 Can you tell me, did that occur at a meeting at
23 which the directors of National Minority Television were
24 present?

25 A Yes. That's where we met at, and then we spent

1 time together afterwards.

2 Q Just tell me in your own words about the time
3 you spent with him afterwards, what you did, where you went.
4 Elaborate a little bit.

5 A We just spent time talking together. He was
6 real interested in the kind of work that we do, with the
7 kind of people we reach out to, and was just really
8 impressed with what our ministry was all about and what we
9 were doing with our homes and our ranch and my concern with
10 National Minority. He was just really interested and
11 impressed with all that type of thing, so we just kind of
12 spent time together like that.

13 Q Did he ever see any of your homes?

14 A No. I didn't get a chance to take him there.

15 Q I'm showing you the minutes of the special
16 meeting of National Minority dated August 15, 1990 that
17 Mr. Cohen showed you. And I'm specifically going to direct
18 your attention to the next to the last paragraph which
19 states, "The board members discussed the current broadcast
20 interests of the corporation and its financial status."

21 Can you tell me, do you recall that discussion?

22 A Vaguely.

23 Q Can you tell me what you recall about the
24 discussion of the current broadcast interests of the
25 corporation.

1 A They were just telling me that they wanted to
2 involve minorities, they wanted to involve minority
3 programming, and that's the reason I was being brought in
4 was so that we could have another voice for minorities.

5 Q Was any information provided about the
6 stations, either full-power or low-power or both, that
7 National Minority Television owned?

8 A Yes. They started sharing with me not only the
9 full-power ones, but they started talking about ones in
10 Fresno, Ohio, different places that they named, and they
11 showed me the information about the low-power ones, and I
12 think they talked about medium-power ones.

13 Q And do you recall the portion of the meeting
14 that concerned the financial status of National Minority and
15 what occurred in that regard?

16 A I don't recall the details real well in that
17 one other than Portland was doing fine and Odessa was doing
18 fine, but we had an opportunity to get into some better.

19 MR. TOPEL: Off the record.

20 (Discussion off the record.)

21 MR. TOPEL: Back on.

22 Q Pastor Aguilar, I'm now showing you minutes of
23 the meeting dated June 27, 1991 which Mr. Cohen showed you.
24 And I'd like to direct your attention to the fourth
25 paragraph wherein it states, "Jane Duff reported that five

1 applications for low power stations are pending before the
2 FCC," listing locations.

3 Do you remember Mrs. Duff making such a report?

4 A Yes, I do.

5 Q Turning to the last two paragraphs of those
6 minutes, actually, the third from the last and the second
7 from the last, which talks about the board considering a
8 financial statement for 1990 with some information about
9 income and then a separate 1991 statement for the Portland
10 station, do you recall those events occurring at that
11 meeting?

12 A Yes, I do. I remember them talking about the
13 finances.

14 Q Do you recall reviewing the two statements that
15 are referred to in those minutes?

16 A Yes.

17 MR. SHOOK: By "statements," you are referring to
18 financial statements, right?

19 MR. TOPEL: Yes.

20 MR. SHOOK: Because the word "statements" could be
21 understood to cover something else.

22 MR. TOPEL: Thank you.

23 Q Did you understand what Mr. --

24 A Yes, financial statements.

25 MR. TOPEL: Thank you, Mr. Shook.

1 Q Now, turning your attention to the minutes of
2 the meeting dated October 2, 1991, which I believe Mr. Cohen
3 did discuss a conference call in which one of the events
4 discussed is the addition of Reverend Hill to the board.

5 I would like to direct your attention to the
6 next to the last paragraph, which reports a motion that you
7 made. Can you tell me what you recall about the matters
8 described in that paragraph, what that concerns.

9 A Well, we were talking about -- let me read
10 that. I remember, in brief, my position was no matter what,
11 let's keep going ahead to try to acquire that station,
12 assets, anything we could get. And I knew we were having
13 opposition, but let's go for it.

14 Q Thank you. And turning now to the fourth
15 paragraph from the bottom, which talks about the board
16 reviewing the activities of the corporation where programs
17 are broadcast through a full-power station and low-power
18 stations, do you recall that discussion occurring in that
19 conference call?

20 A The one right here?

21 Q Right here.

22 A Yes.

23 Q Can you just tell me what you remember about
24 that part of the conference call.

25 A Well, they were explaining to me and we were

1 talking about how the whole difference between the
2 full-power stations and the lower-power stations and why are
3 we acquiring them, how we were looking for them, and that
4 type of thing. In other words, we were out to grab them,
5 though.

6 Q Turning now to the annual meeting of January
7 14th, 1992, and I think this was covered by Mr. Cohen, but
8 there is a reference in here to the president presenting
9 audited financial reports.

10 A Right.

11 Q And some discussion of financial matters. Do
12 you recall those events occurring?

13 A Yes. I remember them bringing out the
14 paperwork on those.

15 Q I'm showing you now the minutes of the meeting
16 dated May 8, 1992. The second paragraph which states that
17 "Paul Crouch and Phil Aguilar gave a report on their meeting
18 with Reverend Hill, President Bush and community leaders on
19 May 7th at Reverend Hill's church," can you tell me what
20 that report that was given at that meeting concerned.

21 A Well, okay. Reverend Hill, Paul Crouch and
22 myself had a meeting with President Bush in South Central
23 L.A., and our purpose was to seek help and work together to
24 do community work there, and we met with all the other
25 leaders of the minorities down there, and so we were giving

1 a report of -- we believed that we were getting some energy
2 and attention and help for the South Central L.A. area in
3 particular, and that was our whole focus, is working in
4 black and Hispanic neighborhoods right there. And this was
5 right during the riot times.

6 MR. TOPEL: Off the record for a second.

7 (Discussion off the record.)

8 MR. TOPEL: Pastor Aguilar, I only have one or two
9 more questions.

10 THE WITNESS: Okay.

11 BY MR. TOPEL:

12 Q Tell me on the record your reaction to the
13 truth of the following statement: Paul Crouch controls
14 Phillip Aguilar.

15 A Could you repeat that.

16 MR. TOPEL: Can I have the question read back.

17 (Record read.)

18 THE WITNESS: Not a chance. Paul Crouch does not
19 control Phillip Aguilar. Phillip Aguilar makes his own
20 decisions and accomplishes the things that he chooses to.
21 Phil Aguilar works together with Paul Crouch on occasion,
22 but not a chance.

23 BY MR. TOPEL:

24 Q Okay. And is your answer the same to the
25 following statement: Trinity Broadcasting Network or its

1 affiliates control Phillip Aguilar?

2 A Trinity Broadcasting does not control Phil
3 Aguilar. We have done and we do joint work together for
4 this common goal. But there is no control factor one upon
5 the other.

6 Q And is the same true as to whether affiliates
7 of the Trinity Broadcasting Network control Phil Aguilar?

8 A None of the affiliates or anyone else on planet
9 earth controls Phil Aguilar.

10 MR. TOPEL: I have nothing further.

11 MR. COHEN: I have a few questions based on yours,
12 Mr. Topel.

13

14 FURTHER EXAMINATION

15 BY MR. COHEN:

16 Q When you answered this last question, the word
17 "affiliates" was in your answer. Do you recall that?

18 A Yes.

19 Q What did you mean by "affiliates" then?

20 A By "affiliates" --

21 Q As you used the word.

22 A I thought you asked a question with the word
23 "affiliates."

24 MR. SHOOK: I think in fairness to the witness --

25 MR. TOPEL: I used the word.

1 MR. COHEN: I understand that. But he answered the
2 question.

3 THE WITNESS: But I'm doing it to what I think he
4 meant.

5 BY MR. COHEN:

6 Q What did you think he meant by the word
7 "affiliates"? When you answered that question, what did you
8 think Mr. Topel meant?

9 A Affiliate station.

10 Q Give me an example of an affiliate station.

11 A Portland.

12 Q Any other examples that you know of?

13 A Odessa, Philadelphia in the future.

14 Q That's what you meant?

15 A Yeah.

16 Q Now, I only have a very brief line of inquiry
17 based on your testimony about Tyrone Brown.

18 Did it come to pass that Tyrone Brown
19 represented NMTV?

20 A He did some form of work on putting in -- and I
21 don't know the legal name, but he wrote something up and we
22 had him send that in, and I'm not sure how widespread that
23 was that he did, but yes, he did do something to seek to
24 help us out.

25 Q As of the time that you resigned from the